

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, <i>et al</i> ,	§	
	§	
Plaintiffs,	§	
VS.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
RICK PERRY, <i>et al</i> ,	§	
	§	
Defendants.	§	

**[PROPOSED] ORDER ON DEFENDANTS’ MOTION TO COMPEL THE  
PRODUCTION OF DOCUMENTS RESPONSIVE TO DEFENDANTS’  
SECOND AND FOURTH REQUESTS FOR PRODUCTION TO  
THE UNITED STATES OF AMERICA RELATED TO  
ELECTION CRIMES AND VOTER FRAUD**

Having considered Defendants’ Motion to Compel the Production of Documents Responsive to the Defendants’ Second and Fourth Requests for Production to the United States of America, the Court finds that the Motion should be, and hereby is, GRANTED. The United States shall promptly search the Federal Bureau of Investigation (FBI), the Department of Justice Criminal Division’s Public Integrity Section (PIN), and United States Attorneys’ Offices (USAO) for all information regarding any allegations (substantiated or unsubstantiated), incidents, prosecutions or convictions of Election Crimes or Voter Fraud.

For the purpose of the United States’ searches, the terms “Election Crimes” and “Voter Fraud” are defined as in Defendants’ Corrected 30(b)(6) Notice to the United States, ECF No. 276.2 at 5–6, which used the terms as defined by the United States Election Assistance Commission. See “Election Crimes: An Initial Review

and Recommendations for Future Study,” at 13 (Dec. 2006) available at [http://www.eac.gov/assets/1/workflow\\_staging/Page/57.PDF](http://www.eac.gov/assets/1/workflow_staging/Page/57.PDF) (last accessed July 27, 2014). The scope of the production shall include information that relates to the following:

1. whether or not the Department of Justice, FBI, PIN, or any USAO investigates, alleges, or prosecutes Election Crimes or Voter Fraud;
2. an overall picture of the amount and type of Election Crimes or Voter Fraud occurring within Texas and the United States, including reports, convictions, indictments; and
3. the enforcement priorities of the Department of Justice, FBI, PIN, and any USAO, including reports regarding the deployment of human resources and budgets.

The United States shall produce the information on or before August 14, 2014, in a format conforming to the Agreement Concerning Production Format in place in this case. To the extent any information to be produced pursuant to this Order is available prior to a 30(b)(6) deposition of the United States, that information shall be produced no less than 48 hours prior to the deposition.

**SO ORDERED.**

Date: \_\_\_\_\_, 2014.

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NELVA GONZALES RAMOS  
United States District Judge